

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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HINDS COUNTY, MISSISSIPPI, et al.,

1:08 cv 2516 (VM)

Plaintiffs,

v.

WACHOVIA BANK N.A., et al.,

Defendants.

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**MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Richard T. Marooney, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Kevin R. Sullivan  
King & Spalding LLP  
1700 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
krsullivan@kslaw.com  
202.626.2624

Kevin R. Sullivan is a member in good standing of the Bar of the District of Columbia and the State of Pennsylvania. There are no pending disciplinary proceedings against Kevin R. Sullivan in any State or Federal court.

Dated: July 10, 2008  
City/State: New York, New York

Respectfully submitted,

KING & SPALDING LLP

By: 

910 828-6564  
JUL 10 2008

Richard T. Marooney (RM-0276)  
1185 Avenue of the Americas  
New York, New York 10036  
(212) 556-2100

*Attorney for Defendants  
Bank of America, N.A. and  
Bank of America Corporation*

**UNITED STATES DISTRICT COURT  
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**AFFIDAVIT OF RICHARD T.  
MAROONEY IN SUPPORT OF  
MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

STATE OF NEW YORK     )  
                                  ) ss.:  
COUNTY OF NEW YORK    )

Richard T. Marooney, being duly sworn, deposes and says:

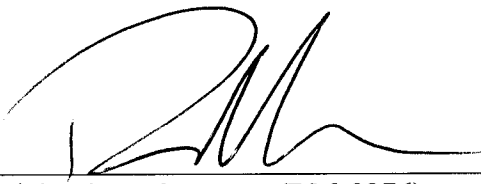
1. I am a member in good standing of the Bar of this Court. I make this affidavit in support of the motion of Defendants Bank of America, N.A. and Bank of America Corporation (collectively "Bank of America") for admission of Kevin R. Sullivan, Esq. to the Bar of this Court *pro hac vice*.

2. Mr. Sullivan is a member of the firm King & Spalding LLP, in Washington, D.C. and is counsel for Bank of America in the above-captioned action. Mr. Sullivan is a member in good standing of the Bar of the District of Columbia and the State of Pennsylvania (certificates of good standing issued within the last thirty (30) are attached hereto as Exhibit A and B, respectively).

3. Mr. Sullivan has advised me that he is familiar with the Federal Rules of Civil Procedure and with the local rules of this Court.

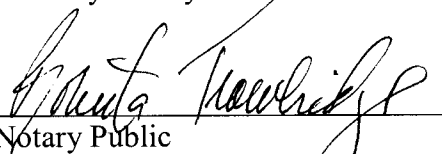
4. I can personally attest that Mr. Sullivan is of the highest competence and character.

5. Accordingly, I respectfully request that Kevin R. Sullivan, Esq. be admitted to the Bar of the Court *pro hac vice*.

  
Richard T. Marooney (RM-0276)

City/State: New York, New York

Sworn to before me this  
10th day of July 2008.

  
Notary Public

ROBERTA TROWBRIDGE  
Notary Public, State of New York  
No. 01TR4662759  
Qualified in Queens County  
Commission Expires September 30, 2009

# Exhibit A



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

KEVIN R. SULLIVAN

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was on the 28<sup>TH</sup> day of AUGUST, 1987,  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on July 2,  
2008.

GARLAND PINKSTON, JR., CLERK

By: Patrick Fegan  
Deputy Clerk

# Exhibit B



THE DISCIPLINARY BOARD  
OF THE  
SUPREME COURT OF PENNSYLVANIA

First Floor  
Two Lemoyne Drive  
Lemoyne, PA 17043-1226  
(717) 731-7073

**CERTIFICATION OF INACTIVE STATUS**

*In lieu of Certificate of Good Standing*

*For*

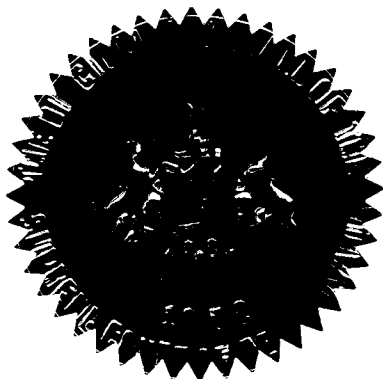
**KEVIN R. SULLIVAN**

*PA Bar Number 21779*

I, Suzanne E. Price, as the Attorney Registrar for the Disciplinary Board of the Supreme Court of Pennsylvania, hereby confirm that Kevin R. Sullivan was admitted as an Attorney by the Supreme Court of Pennsylvania to the bar of the courts of the Commonwealth of Pennsylvania on October 29, 1975.

Mr. Sullivan is currently registered as "Voluntarily Inactive", having assumed said status as of July 1, 1995.

Dated this 3<sup>rd</sup> day of July, 2008



By: Suzanne E. Price  
Suzanne E. Price  
Attorney Registrar



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served the foregoing MOTION TO  
ADMIT COUNSEL PRO HAC VICE upon all counsel of record via electronic mail.

Dated: July 10, 2008

City/State: New York, New York

By:



Richard T. Marooney (RM-0276)  
King & Spalding LLP  
1185 Avenue of the Americas  
New York, NY 10036  
Phone: (212) 556-2100  
Fax: (212) 556-2222

*Attorney for Defendants  
Bank of America, N.A. and  
Bank of America Corporation*

**UNITED STATES DISTRICT COURT  
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**ORDER**

Pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York and upon the affidavit of Richard T. Marooney, Esq., a member of the Bar of this Court, it is

ORDERED that Kevin R. Sullivan, Esq. be admitted to the Bar of the Court *pro hac vice* as counsel for Defendants Bank of America, N.A. and Bank of America Corporation.

Dated: July \_\_, 2008  
City/State: New York, New York

SO ORDERED:

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Victor Marrero  
U.S.D.J.